

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 03-10387-DPW
)
 EARL CHARLEY, JR.)

MOTION TO CONTINUE RULE 11 HEARING

Defendant, Earl Charley, Jr., hereby moves that this Court continue the Rule 11 hearing currently scheduled for March 31, 2005 from March 31 until a date during the week of April 4.

____As grounds for this motion, undersigned counsel states that Mr. Charley's attorney, Leo Sorokin, is leaving the Federal Defender Office and undersigned counsel will now be representing Mr. Charley. Undersigned counsel had previously arranged a non-refundable trip out of state, leaving the morning of March 31. Therefore, she will be unavailable for the Rule 11 hearing.

Assistant U.S. Attorney Christopher Bator has stated that he assents to this motion.

EARL CHARLEY, JR.
By his attorney,

/s/Miriam Conrad

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March 23, 2005